



PO Box 97061 Redmond, WA 98073

425-580-8112 Phone 425-580-8652 Fax cindy.manheim@att.com

May 25, 2010

Carol Hulse Oregon Public Utility Commission 550 Capitol St., NE Suite 215 Salem, OR 97301

Re: UM 1481

Correcting Petition to Intervene with waiver of paper service

Dear Ms. Hulse:

On May 21, a Petition to Intervene in Docket No. UM 1481 ("Petition") was filed by AT&T Communications of the Pacific Northwest, Inc., TCG Joint Venture Holdings, Inc d/b/a TCG Oregon and AT&T Mobility LLC and its subsidiaries operating in Oregon ("AT&T"). This filing is being made to clarify that AT&T waives paper service for all three persons listed on the Petition, namely, Cindy J. Manheim, Sharon L. Mullin and David Collier. Please find a copy of that filing attached to this Correction filing.

If you have any questions, please do not hesitate to contact me.

Sincerely, Cyntha Mahn by De with permission

Cynthia Manheim General Attorney

attachment

# **CERTIFICATE OF SERVICE**

# UM 1481

I hereby certify that on the 25<sup>th</sup> day of May, 2010, I served the foregoing Correcting Petition to Intervene with waiver of paper service by AT&T in the above entitled docket on the following persons via U.S. Mail, by mailing a correct copy to them in a sealed envelope, with postage prepaid, addressed to them at the address shown below, or via email only if the service list indicates such persons waive paper service.

Arthur A. Butler (W) Ater Wynne LLP 601 Union Street, Ste 1501 Seattle, WA 98101-3981 aab@aterwynne.com	Roger T. Dunaway (W) Ater Wynne LLP 601 Union Street, Ste 1501 Seattle, WA 98101-3981 rtd@aterwynne.com	Gordon Feighner (W) Energy Analyst Citizens' Utility Board of OR 610 SW Broadway, Ste 308 Portland, OR 97205 gordon@oregoncub.org
Robert Jenks (W) Executive Director Citizens' Utility Board of OR 610 SW Broadway, Ste 308 Portland, OR 97205 bob@oregoncub.org	G. Catriona McCracken (W) Legal Counsel/Staff Atty Citizens' Utility Board of OR 610 SW Broadway, Ste 308 Portland, OR 97205 catriona@oregoncub.org	Raymond Myers (W) Attorney Citizens' Utility Board of OR 610 SW Broadway, Ste 308 Portland, OR 97205 ray@oregoncub.org
Kevin Elliott Parks (W) Staff Attorney Citizens' Utility Board of OR 610 SW Broadway, Ste 308 Portland, OR 97205 kevin@oregoncub.org	Michael T. Weirich Assistant Attorney General Department of Justice 1162 Court St. NE Salem, OR 97301-4096 michael.weirich@doj.state.or.us	Richard A. Finnigan Attorney at Law Law Office of Richard A. Finnigan 2112 Black Lake Blvd SW Olympia, WA 98512 rickfinn@localaccess.com
Craig Phillips Oregon Exchange Carrier Assn 800 C. St. Vancouver, WA 98660 cphillips@oeca.com	Roger White Program Manager Public Utility Commission of OR PO Box 2148 Salem, OR 97308 roger.white@state.or.us	Alex M. Duarte Corporate Counsel Qwest Corporation 421 SW Oak St. Ste 810 Portland, OR 97204 alex.duarte@qwest.com
Mark Reynolds Qwest Corporation 1600 7 <sup>th</sup> Ave RM 3206 Seattle, WA 98191 mark.reynolds3@qwest.com		

AT&T

By:

David Collier

645 E. Plumb Lane, Rm C142

P.O. Box 11010

Reno, NV 89520

(775) 333-3986 (telephone)

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david.collier@att.com



Cynthia Manheim General Attorney Regulatory PO Bex 97061 Redmond, WA 98073

425-580-8112 Phone 425-580-8652 Fax <u>indy manheim@alt.com</u>

May 21, 2010

Carol Hulse Oregon Public Utility Commission 550 Capitol St., NE Suite 215 Salem, OR 97301

Re: UM 1481

Dear Ms. Hulse:

Enclosed for filing in the above entitled matter, please find an original and five (5) copies of the Petition to Intervene, including Certificate of Service, of AT&T Communications of the Pacific Northwest, Inc., TCG Joint Venture holdings, Inc d/b/a TCG Oregon and AT&T Mobility LLC and its subsidiaries operating in Oregon.

If you have any questions, please do not hesitate to contact me.

Sincerely,
Cynthia Mal

Cynthia Manheim General Attorney

attachment

# BEFORE THE PUBLIC UTILITIES COMMISSION OF OREGON

#### UM 1481

In the Matter of	
PUBLIC UTILITY COMMISSION OF OREGON	) PETITION TO INTERVENE BY ) AT&T )
Staff Investigation of the Oregon Universal Service Fund	) ) )

AT&T Communications of the Pacific Northwest, Inc., TCG Joint Venture

Holdings, Inc d/b/a TCG Oregon and AT&T Mobility LLC and its subsidiaries operating
in Oregon (collectively "AT&T") hereby submit this Petition to Intervene pursuant to

OAR 860-012-0001 in the above-referenced docket.

# I. Name and Address of Petitioners

AT&T Communications of the Pacific Northwest, Inc. One AT&T Way, Room 2B115E, Bedminster, NJ 07921

TCG joint Venture Holdings, Inc. d/b/a TCG Oregon One AT&T Way, Room 2B115E, Bedminster, NJ 07921

AT&T Mobility LLC 1025 Lenox Park Blvd. NE, Atlanta, GA 30319

# II. Name and Address of Petition's Attorney and Representative

Petitioner will be represented in this proceeding by the following attorney:

Cindy J. Manheim General Attorney AT&T PO Box 97061 Redmond, WA 98073 (425) 580-8112 (telephone) (425) 580-8333 (facsimile) eindy.manheim@att.com In addition, AT&T requests that the following representatives be on the service list:

Sharon L. Mullin
Director – External Affairs
AT&T Services, Inc.
400 W. 15<sup>th</sup> St., Ste. 930
Austin, TX 78701
(512) 879-2280 (telephone)
(832) 213-0203 (facsimile)
slmullin@att.com

David Collier
Area Manager – Regulatory Affairs
AT&T Services, Inc.
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P.O. Box 11010
Reno, NV 89520
(775) 333-3986 (telephone)
(775) 333-2364 (facsimile)
david.collier@att.com

#### III. Nature and Extent of Petitioner's Interest in This Proceeding

This docket is a request for investigation into the issue of Oregon Universal Service Fund ("OUSF"), specifically whether or not there should be a fund, what services the OUSF should support, requirements to qualify for support, and other related matters.

AT&T has a direct and substantial interest in the outcome of this issue and has been actively involved in this issue before the Federal Communications Commission. As such. AT&T has an interest to make sure that this application is resolved in a reasonable, competitively neutral and nondiscriminatory manner.

AT&T generally intends to address or comment on various issues raised in this docket. AT&T's appearance will not unreasonably broaden the issues, burden the record, or delay this proceeding.

AT&T respectfully requests that the Commission grant its Petition to Intervene in this docket with all of the rights afforded a full party under Oregon law and the Commission's rules.

Dated:

May 21, 2010

AT&T COMMUNICATIONS OF THE PACIFIC NORTHWEST, INC. TCG Joint Venture Holdings, Inc d/b/a TCG Oregon, AT&T Mobility LLC

Cindy Mankeim

PO Box 97061

Redmond, WA 98073 cindy.manheim@att.com

425.580.8112

(Fax) 425.580.8333

#### CERTIFICATE OF SERVICE

# UM 1481

I hereby certify that on the 21<sup>st</sup> day of May, 2010, I served the foregoing Petition to Intervene by AT&T in the above entitled docket on the following persons via U.S. Mail, by mailing a correct copy to them in a sealed envelope, with postage prepaid, addressed to them at the address shown below, or via email only if the service list indicates such persons waive paper service.

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Kevin Elliott Parks (W) Staff Attorney Citizens' Utility Board of OR 610 SW Broadway, Ste 308 Portland, OR 97205 kevin@oregoncub.org	Michael T. Weirich Assistant Attorney General Department of Justice 1162 Court St. NE Salem, OR 97301-4096 michael weirich@doj state.or.us	Richard A. Finnigan Attorney at Law Law Office of Richard A. Finnigan 2112 Black Lake Blvd SW Olympia, WA 98512 rickfinn@localaccess.com
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